UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-

2(c)

ROBINSON BROG LEINWAND GREENE

GENOVESE & GLUCK P.C.

875 Third Avenue, 9th Floor

New York, New York 10022

Phone: 212-603-6033 Fax: 212-956-2164 Counsel to Debtors

FRED B. RINGEL MICHAEL A. LEON

CLEMENT YEE

In Re:

POCMONT PROPERTIES, LLC et al,

Debtors.

Hearing Date:

January 20, 2015 at 2:00 p.m.

Case No.: 14-16493

Jointly Administered

Judge: Christine M. Gravelle

Chapter: 11

NOTICE OF DEBTORS' MOTION FOR ENTRY OF ORDER EXTENDING EXCLUSIVE RIGHT TO SOLICIT ACCEPTANCES OF DEBTORS' JOINT PLAN OF REORGANIZATION AND FOR RELATED RELIEF

PLEASE TAKE NOTICE, that on the date specified above, the undersigned, as counsel for Pocmont Properties LLC and Pocmont Holdings LLC (together, the "Debtors"), shall move before the Honorable Christine M. Gravelle, United States Bankruptcy Judge, United States Bankruptcy Court, Clarkson S. Fisher US Courthouse, 402 East State Street, Trenton, New Jersey 08608, seeking the entry of an order extending the Debtors' exclusive period to solicit acceptances for their joint plan of reorganization, and for such other relief that is just and proper.

PLEASE TAKE FURTHER NOTICE, that the undersigned shall rely upon the motion filed herewith in support of the relief sought.

PLEASE TAKE FURTHER NOTICE, that no brief is being filed herewith since the {00704615.DOC;1 }

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legal basis upon which relief should be granted is set forth in the motion.

PLEASE TAKE FURTHER NOTICE, that oral argument is waived unless objections are filed.

PLEASE TAKE FURTHER NOTICE, that all objections must be in writing, filed with the Clerk of the United States Bankruptcy Court, Clarkson S. Fisher US Courthouse, 402 East State Street, Trenton, New Jersey 08608, and a copy thereof must simultaneously be served upon Robinson Brog Leinwand Genovese & Gluck P.C., Attn: Fred B. Ringel, Esq., 875 Third Avenue, New York, New York 10022 so that such objections are received no later than seven (7) days prior to the return date set forth

Dated: December 5, 2014 New York, New York

herein above.

Robinson Brog Leinwand Greene Genovese & Gluck P.C.
Counsel to the Debtor
875 Third Avenue, 9th Floor
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Tel. No.: 212-603-6345

By: /s/ Fred B. Ringel
Fred B. Ringel

and

Wasserman, Jurista & Stolz, P.C. Local Counsel to the Debtor Milburn Avenue, Suite 207 PO Box 1029 Milburn, NJ 07041